

ARC ECOLOGY
ARMS CONTROL RESEARCH CENTER
833 Market Street, Suite 1107, San Francisco, CA 94103
Tel: (415) 495-1786 Fax: (415) 495-1787

2 September 1995

(Postmarked 9/5/95)
Rec'd 9/8/95
mem

Mr. Michael McClelland
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command, Code 62.3
900 Commodore Way, Building 105
San Bruno, CA 94066-2402

RE: Comments on the Navy's Draft Final Proposed Plan for Parcel A, Hunters Point Annex

Dear Mr. McClelland:

Arc Ecology reviewed the Navy's Draft Final Proposed Plan for Parcel A, and finds two broad areas of concern: residual contamination at five of the nine Site Investigation (SI) and Remedial Investigation (RI) sites and poor characterization of issues concerning the parking lot spring.

Arc supports prompt transfer of clean properties that maximize reuse options to the City of San Francisco. Since the City of San Francisco anticipates that Parcel A will be redeveloped for residential purposes, it seems only prudent that all of Parcel A be cleaned to residential standards. The Navy must ensure that filled areas remain protective of health, even when uncovered as a result of site grading and excavation for new foundations during planned reconstruction.

Arc supports remediation that protects the health of potential users and honors their concerns over the long term. Residents of the Hunters Point neighborhood continue to express concern about contamination in the area. That the San Francisco Department of Health conducted a study in 1995 to compare incidence of cancer in the Bayview Hunters Point neighborhood to those in the San Francisco Bay Area largely in response to residents' concern over possible exposure to harmful chemicals shows that people in the community take seriously threats to their health resulting from local contamination. Potential Parcel A residents ought to feel confident that they will be able to live in their new homes, allow their children to play, garden, and eat their homegrown vegetables without fear of illness or shortened lifespan resulting from residual contamination.

Arc Ecology finds little evidence to support "no action" as the appropriate remedial action alternative for Parcel A. The information presented in the Navy's Draft Final Proposed Plan for Parcel A, Hunters Point Annex, and supporting documents, do not support the Navy's contention that all of the nine Site Investigation (SI) and Remedial Investigation (RI) sites indeed "do not pose a threat to human health or the environment."

The Navy reports in the RI document:

- hazard indices 1.4 to 36 times above health-protective standards for children exposed to soils given a residential exposure scenario at sites SI-19, SI-41, SI-43, SI-50, and IR-59 JAI
- hazard indices 2 to 100 times above health-protective standards for vegetable consumption for both children and adults at sites SI-19, SI-41, SI-43, IR-59, and IR-59 JAI
- soil lead contamination above California-modified Preliminary Remediation Goals at sites SI-41 and SI-43
- cancer risk of 2×10^{-3} at IR-59-JAI. Generally risks below 10^{-4} to 10^{-6} are considered protective of human health by the Environmental Protection Agency.

Attachment I summarizes SI and RI results.

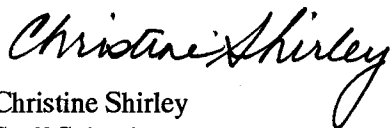
We based our comments on information presented in the DRAFT Parcel A Remedial Investigation/Feasibility Study Report, dated June 30, 1995. We understand that FRC intends to substantially revise this report before producing the Draft Final RI/FS. This, too, causes us to question the appropriateness of proposing "no action" at this time.

Since the remaining contaminated areas are small compared to total Parcel A acreage, Arc sees no reason why cleaning these sites to residential standards should delay transfer of title to the City, or for that matter, delay redevelopment efforts. In the meantime, before full cleanup, the Navy should post warnings and restrict activities on the still-contaminated SI/RI sites until they indeed pose no threat to human health.

The parking lot spring area presents Arc with another source for concern. One water sample collected at the spring showed motor oil contamination. Although the Draft RI/FS gives little reason to suspect that groundwater contributes to contamination around the spring, Arc believes it is too early to conclude that contamination in or around the spring poses no threat to human health or the environment. Was this contamination an isolated incident? If not, where is the motor oil coming from? Could the spring offer a pathway for contaminants to enter the groundwater? Is the area biologically sensitive? Arc requests that access by children to the spring be restricted, that the area be protected from development, and that a program of quarterly monitoring be maintained until these questions are answered.

Arc looks forward to your response and to expeditious transfer of Parcel A. Please feel free to call me if you have any questions or need clarification regarding these comments.

Sincerely,


Christine Shirley
Staff Scientist

Cc: distribution
Attachment
word: hpaa.doc

cc:

U.S. Environmental Protection Agency (Attn. Alydda Mangelsdorf)
California Regional Water Quality Control Board, San Francisco Bay Region (Attn. Richard Hiett)
City and County of San Francisco, Department of Public Health (Attn. Amy Brownell)
City and County of San Francisco, Department of Public Health (Attn. Bill Lee)
San Francisco Lawyers Committee for Civil Rights (Attn. Michael Harris)
Chair, Citizens Advisory Committee (Attn. Shirley Jones)
Department of Toxic Substances Control (Attn. Chien Kao)
Department of Toxic Substances Control (Attn. Cyrus Shabahari)
San Francisco Redevelopment Agency (Attn. Byron Rhett)
Businesses of Hunters Point Shipyard (Attn. Scott Madison)
The New Bayview Committee (Attn. Sam Murray)
Citizens Advisory Committee (Attn. Willie McDowell)
Bay Conservation and Development Commission (Attn. Jennifer Ruffolo)
Board of Supervisors, San Francisco (Attn. Kevin Shelley)
Naval Facilities Engineering Command (Attn. Michael McClelland)
Naval Facilities Engineering Command (Attn. William McAvoy)

Attachment 1

Summary of Site Inspection and Remedial Investigation Results for Parcel A Sites

CANCER RISKS				HAZARD INDICES		
SITE	Industrial	Residential	Produce	Industrial	Residential	Produce
SI-19	2×10^{-5}	8×10^{-6} child 3×10^{-5} adult	7×10^{-6}	0.44	28 child 0.77 adult	<i>20 child</i> <i>5 adult</i>
SI-43	2×10^{-5}	7×10^{-6} child 3×10^{-6} adult	2×10^{-5}	0.29	3 child 0.54 adult	<i>9 child</i> <i>2 adult</i>
IR-59	2×10^{-9}	1×10^{-8}	2×10^{-8}	0.05	1	<i>5 child</i> <i>1 adult</i>
IR-59 JAI	2×10^{-6}	2×10^{-3}	5×10^{-6}	0.1	3	<i>9 child</i> <i>2 adult</i>
SI-41	1×10^{-5}	6×10^{-6} child 3×10^{-5} adult	5×10^{-6}	0.3	36 child 0.59 adult	<i>100 child</i> <i>30 adult</i>
SI-77	NE	NE	NE	NE	NE	NE
SI-45	NE	NE	NE	NE	NE	NE
SI-50	3×10^{-8}	1×10^{-8} 6×10^{-8}	NE	0.22	1.4 child 0.35 adult	NE
SI-51	NE	NE	NE	NE	NE	NE
IR-59 GW	NE	NE	NE	NE	NE	NE

Note: Numbers in italics are from the Draft Parcel A Remedial Investigation/Feasibility Study Report, June 30, 1995. All others from the Draft Final Site Investigation Report, October 15, 1993.

The methods and assumptions used to estimate risks and hazard indices differ between these reports, as follows:

<u>Method/Assumption</u>	<u>Site Investigation</u>	<u>Remedial Investigation</u>
Methodology	HBL based	PRG based
Child body weight	70 kg	15 kg
Exposure Duration	30 years	24 years

Art Ecology
833 Market St. #1107
San Francisco, Ca 94103



Mr. Michael McClelland
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command, Code 62.3
900 Commodore Way, Building 105
San Bruno, Ca 94066-2402

